

JAP:RMT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M11-209

- - - - -X

UNITED STATES OF AMERICA

REMOVAL TO THE NORTHERN
DISTRICT OF NEW YORK

against -

(Fed. R. Crim. P. 5(c))

BRUCE REID,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

BRAD PLEMONS, being duly sworn, deposes and says that he is a Special Agent with the United States State Department, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

Upon information and belief, on January 12, 2011, an arrest warrant was issued by the United States District Court for the Northern District of New York, commanding the arrest of the defendant BRUCE REID for Passport Fraud, Use of a Social Security Number Procured by Fraud and Aggravated Identity Theft, in violation of Title 18, United States Code, Sections 1542, 408(a)(7)(A) and 1028A(a)(1), respectively.

The source of your deponent's information and the grounds for his belief are as follows:

1. On January 12, 2011, an arrest warrant was issued by the United States District Court for the Northern District of New York, commanding the arrest of the defendant BRUCE REID for Passport Fraud, Use of a Social Security Number Procured by Fraud and Aggravated Identity Theft, in violation of Title 18, United

States Code, Sections 1542, 408(a)(7)(A) and 1028A(a)(1), respectively. A copy of the arrest warrant, complaint and supporting affidavit from the Northern District of New York are attached hereto.

2. DSS has been investigating the defendant BRUCE REID in connection with what appeared to be a fraudulently obtained United States passport issued in the name "Daniel Krieger." That passport was originally issued on or about March 24, 1992 and was renewed on numerous occasions, most recently on or about April 12, 2010. The most recently issued passport bears the number 422060298. The initial application and the renewal applications all included photographs of what appeared to be the same individual. The applications also listed the same date of birth and social security number. However, DSS has determined that the Daniel Krieger with the date of birth and social security number listed on those passport applications is actually deceased.


3. Because the defendant BRUCE REID has connections with China, DSS contacted Chinese authorities to determine whether REID was residing in China. Chinese authorities confirmed that an individual using the "Daniel Krieger" identity and the corresponding United States passport number 422060298 was residing in China on a visa. Chinese officials subsequently informed DSS that the defendant BRUCE REID was going to be deported to the United States and that he would be arriving at


John F. Kennedy International Airport aboard China Eastern Flight 587 on or about February 24, 2011.

4. On or about February 24, 2011, an individual whose appearance matched the appearance of the person depicted in the photographs submitted in the previously mentioned fraudulent passport applications arrived aboard China Eastern Flight 587 and presented passport number 422060298 in the name "Daniel Krieger" to Customs and Border Protection officers. He was then detained. That individual subsequently admitted to federal agents in sum, substance and part that his true name is "Bruce Reid" and that he had been fraudulently using the identity of "Daniel Krieger."

5. It is the desire of the United States Attorney for the Northern District of New York that the defendant BRUCE REID be removed in custody to that district for prosecution.

WHEREFORE, it is requested that the defendant BRUCE REID be dealt with according to law.



Brad Plemons
Special Agent
Diplomatic Security Service

3E
DISTRICT OF NEW YORK

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of New York

United States of America

v.

BRUCE A. REID

Defendant

Case No.

5:11-MJ-11(ATB)

U.S.D.C. FOR THE NORTHERN DISTRICT OF NEW YORK
I, the undersigned Clerk of the Court, do hereby certify that this
is a true, correct and full copy of the original document on file in
my custody.# of pages (text) 1 ; # of pages including (exhibits) 1
Dated 11/12/11 Lawrence K. Barmore, Clerk
by B. G. G. G. Deputy Clerk

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Bruce A. Reid

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 1542, Passport Fraud

Title 42, United States Code, Section 408(a)(7)(A), Use of a Social Security Number Procured by Fraud

Title 18, United States Code, Section 1028A(a)(1), Aggravated Identity Theft

Date: 01/12/2011

 Issuing officer's signature
City and state: Syracuse, New York

Hon. Andrew T. Baxter, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

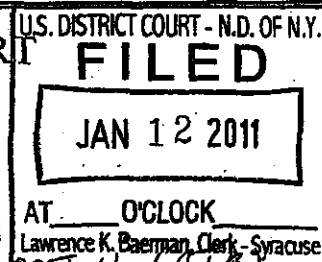
United States of America

v.

BRUCE A. REID

Defendant(s)

Case No. 5:11-mj-11 (118)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2009 and April 5, 2010 in the county of Onondaga in the
Northern District of New York, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1542	Passport Fraud
42 U.S.C. § 408(a)(7)(A)	Use of a Social Security Number Procured by Fraud
18 U.S.C. § 1028A(a)(1)	Aggravated Identity Theft

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Michael McCole, Special Agent, SSA-IG
Printed name and title

Sworn to before me and signed in my presence.

Date:

1/12/11

Judge's signature

City and state: Syracuse, New York

Hon. Andrew T. Baxter, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Introduction

MICHAEL C. McCOLE, being duly sworn deposes and states that

1. I am employed as a Special Agent of the Social Security Administration, Office of Inspector General (hereinafter SSA-OIG) and I have served in this capacity since 1997. Prior to that I served as a Special Agent of the General Services Administration, Office of Inspector General from 1991 to 1997. I have completed the Criminal Investigators Training Program and numerous other advanced law enforcement-training classes at the Federal Law Enforcement Training Center, Glynco, GA.
2. I submit this affidavit in support of an application for a criminal complaint charging Bruce REID, aka Daniel KRIEGER, with a violation of Title 18, United States Code, Section 1542 – False Statement in Application and Use of a Passport, Title 42, United States Codes, Section 408(a)(7)(A) – Misuse of a Social Security Account Number Obtained Through Fraud, and Title 18, United States Code, Section 1028A - Aggravated Identity Theft.
3. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the filing of a complaint, I have not included details of every aspect of this investigation. Rather, I have set forth those facts and circumstances necessary to establish probable cause for the issuance of the complaint. Where conversations or statements are related herein, they are presented in substance and in part and are not verbatim. The information contained in this affidavit is based upon my own personal knowledge and participation in this investigation and upon information and belief, the sources of which are my review of records and conversations and review of reports from other law enforcement agencies.
4. On June 7, 2010, SSA-OIG was contacted by an investigator with the New York State Department of Motor Vehicles, Division of Field Investigations, Syracuse, NY who requested assistance verifying certain information submitted to the NYS DMV on an application for an identity document.
5. During a telephone conversation to discuss the request, the NYS DMV investigator informed me that facial recognition software utilized by the NYS DMV had identified two separate and distinct NYS DMV documents issued to two allegedly different individuals who appear, based on the photographs contained within the documents, to be the same person.

6. The NYS DMV investigator provided me with the identities and corresponding photographs associated with the NYS DMV documents and requested assistance determining if the Social Security account numbers used on the NYS DMV applications for the documents were valid. The two individuals were:

Daniel J. KRIEGER

DOB: 12/26/1965

Died: July 4, 1970 from Leukemia (See pp 16)

SSN: XXX-XX-6471

SSN issued March 1, 1989.

US Passport issued:

March 24, 1992

NYS DMV photograph captured on 2010-04-05 (See attachment 1)

Bruce A. REID

DOB: 12/7/1960

SSN: XXX-XX-7043

SSN issued February 1, 1973

NYS DMV photograph captured on 2009-07-09 (See attachment 2)

7. The NYS DMV provided full Social Security account numbers for review, however for the purpose of limiting disclosure of complete Social Security account numbers, only the last four digits will be displayed in this affidavit.
8. I conducted a Numident Query of the Social Security database to determine the status of the referenced Social Security account numbers. A Numident Query identifies the issued name, date of birth, place of birth, office of issuance and parent's names for each Social Security account number issued by the Commissioner of Social Security..
9. My review determined that both numbers were valid and had been issued to the named persons. In order to conduct additional investigation to determine if the SSN's had been issued properly, I requested copies of the Form SS-5 Application for a Social Security Number. I received copies of the microfiche records maintained by the Social Security Administration Records Center, Boyers, PA on June 18, 2010.
10. The records of SSA reflect that SSN: XXX-XX-7043 was issued to Bruce Alan REID on February 1, 1973. The Social Security Administration mailed the card to the address of record provided on the application: 7 Whitney St., White Plains, NY 10606. This is the same address which KRIEGER listed as his permanent residence in a November 5, 2001 US passport application. (See pp 23)

11. Records of the New York State Division of Criminal Justice Services (NYS DCJS) reflect that Bruce A. REID, DOB: 1960-12-07, was convicted of Sodomy, 3rd degree – Actor 21 or More has Deviate Intercourse with a Person under 17 in violation of NYS Penal Law Section 130.40 on December 2, 1985. REID was sentenced to 70 days incarceration and five years probation.
12. The records of SSA reflect that SSN: XXX-XX-6471 was issued to Daniel James KRIEGER on March 1, 1989. The application was processed in the Social Security district office, Amherst, NY and the Social Security card was mailed to an address in Clifton Park, NY.
13. The address in Clifton Park, NY provided by KRIEGER to the Social Security Administration is the same address of record contained in the NYS DCJS arrest history for Bruce REID referenced in paragraph 11.
14. On June 21, 2010, Special Agent Jason Egerbrecht, US Department of Homeland Security, Immigration and Custom Enforcement (hereinafter ICE) contacted me. S/A Egerbrecht informed me that he had also been contacted by an investigator with the NYS DMV requesting assistance in determining rather REID and KRIEGER were the same person.
15. S/A Egerbrecht stated that during his review of government records, he had determined that the US Department of State had issued REID and KRIEGER valid US passports. S/A Egerbrecht informed me that his review of the application available to him through an on-line system substantiated the NYS DMV allegation that REID and KRIEGER were in fact the same person. S/A Egerbrecht told me that in his opinion the person photographed in connection with both the REID and KRIEGER passport application are the same person.
16. A review of the New York State, Department of Health, Bureau of Vital Statistics has located a death certificate which disclosed that Daniel J. Krieger, born 12/26/1965, died of Leukemia in West Seneca, NY on July 4, 1970. The parents listed on this death certificate are the same individuals listed on the Numident record as the parents of the Daniel KRIEGER issued SSN: XXX-XX-6471 on March 1, 1989.
17. On June 21, 2010, the ex-wife of Daniel KRIEGER was located and interviewed at her residence in Syracuse, NY. The interview was conducted by special agents of the Bureau of Diplomatic Security, US Department of State. I have discussed this interview with them and reviewed a statement provided by KRIEGER's ex-wife Maria *****.
18. Maria ***** stated that she was married to a man she knew as Daniel KRIEGER. Maria ***** further stated that a family friend, Joe ***** (see pp 20-22), often referred to her husband as "Bruce." Maria ***** also stated that she located documents in the family residence on occasion addressed to Bruce Reid. When Maria

***** spoke with KRIEGER about the use of Bruce Reid as an identity, KRIEGER denied ever using a second identity.

19. During the interview, US DSS special agents showed Maria ***** photographs submitted with US passport application for both REID and KRIEGER. Maria ***** examined the two photographs and stated that each image is that of her ex-husband, known to her as Daniel KRIEGER.

Facts In Support of Probable Cause

Count 1, 18 USC § 1542

20. Bruce Alan REID completed an Application for a U.S. Passport By Mail on June 27, 2009. As part of this application, a photograph was attached. Question 19 of the application requires applicants to provide the name, address, telephone number and relationship for an emergency contact. REID provides the name Joe *****, with a Syracuse, NY address whom he identifies as his stepbrother.
21. Daniel J. KRIEGER completed an Application for a U.S. Passport by Mail on April 6, 2010. As part of this application, a photograph is attached. Question 19 of the application requires applicants to provide the name, address, telephone number and relationship for an emergency contact. KRIEGER provides the name Joe *****, whom he identifies as his cousin, with the same Syracuse, NY address that REID listed for his step-brother.
22. The emergency contact listed for REID and KRIEGER is the same person. In addition, I have reviewed the electronic copies of the passport applications and, in my opinion, the person in the photograph attached to the applications in both the REID and KRIEGER application is the same individual.
23. KRIEGER was initially issued a U.S. passport by the US Department of State on March 24, 1992. An Application for a U.S. Passport by Mail was completed by KRIEGER on November 5, 2001 in order to renew the passport prior to the ten-year expiration. On the November 5, 2001 application, KRIEGER lists his permanent address as 7 Whitney Street, White Plains, NY 10606. This the same address provided to the Social Security Administration in 1973 as the residence of the then twelve-year old Bruce REID. Because of this application, KRIEGER was issued US passport number Z824749 that is valid until November 2011.
24. A review of a PS Form 1093 – Application for Post Office Box reflects that Daniel J. KRIEGER applied for a US Postal Service box at the main post office located on Taft Rd., Syracuse, NY 13220 on April 5, 2010. In support of this application, KRIEGER provided US Passport Z824749 as proof of identity.

25. The ex-wife of Daniel KRIEGER, Maria *****, has examined photographs of both REID and KRIEGER contained in the records of the US Department of State and has stated that her ex-husband is the person in each photograph.

Count 2, 42 USC § 408(a)(7)(A)

26. A review of a NYS DMV Application for Driver License or Non-Driver ID Card completed by KRIEGER on April 5, 2010 in Syracuse, NY reflects that a US Passport and Social Security card procured through fraud were submitted as proof of identity in support of the application.

Count 3, 18 USC § 1028A

27. A review of records maintained by the US Social Security Administration, US Department of State, NYS BVS and NYS DMV has disclosed that Bruce REID has utilized the identity Daniel KRIEGER, to include name, date of birth, mother's name and father's name to obtain a Social Security account number. REID aka KRIEGER then utilized the name, date of birth and Social Security account number issued to Daniel KRIEGER to obtain a US passport and a NYS non-driver identification card in a false identity.
28. The ex-wife of Daniel KRIEGER, Maria *****, has examined photographs of both REID and KRIEGER contained in the records of the US Department of State and has stated that her ex-husband is the person in each photograph.

Conclusion

Based upon the above facts and circumstances, your affiant believes that Bruce Alan REID and Daniel J. KRIEGER are one and the same person. REID has obtained a US passport through the submission of false documents and has used that fraudulently obtained passport with the intent to deceive the US Postal Service as to his true identity in violation of 18 USC § 1542. REID also fraudulently obtained a Social Security account in the name of Daniel KRIEGER through the use of personal identifying information and the submission of documents issued to a deceased individual. REID aka KRIEGER has used the fraudulently obtained Social Security account number in the Northern District of

New York to obtain a non-driver identification card issued by the NYS DMV in violation of 42 USC § 408(a)(7)(A). REID aka KRIEGER has utilized the false identity within the Northern District of New York as referenced above in violation of 18 USC § 1028A.



Michael C. McCole

Special Agent

Social Security Administration

Office of Inspector General